

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

WEYERHAEUSER COMPANY, a
Washington corporation and
WEYERHAEUSER NR COMPANY, a
Washington corporation,

Plaintiffs,

v.

WESTWOOD CAPITAL FUNDING LLC, a
New York limited liability company;
HUNTINGTON BANCSHARES
INCORPORATED, a Maryland corporation;
IRONWOOD FINANCE INC., a Texas
corporation; GULF COAST BANK AND
TRUST COMPANY, a Louisiana corporation;
AJ EQUITY GROUP LLC, a New York
limited liability company; RAISTONE
PURCHASING LLC—SERIES XXI, a
Delaware and New York limited liability
company; GROVER CAPITAL LLC, a New
York limited liability company; RAYMOND
PROPERTIES LLC, a Illinois limited liability
company; CAMPISI ENVIRONMENTAL
ASSOCIATES, INC., a Massachusetts
corporation; the COMMONWEALTH OF
MASSACHUSETTS; and ARTHUR
KURZYDLO, an individual.

Defendants.

NO. 2:23-CV-300

COMPLAINT FOR INTERPLEADER
RELIEF

COMPLAINT FOR INTERPLEADER RELIEF - 1

CAIRNCROSS & HEMPELMANN, P.S.
ATTORNEYS AT LAW
524 Second Avenue, Suite 500
Seattle, Washington 98104-2323
office 206 587 0700 fax 206 587 2308

COMES NOW Plaintiffs WEYERHAEUSER COMPANY and WEYERHAEUSER NR COMPANY (“Plaintiffs” or “Weyerhaeuser”) and hereby file their claim for Interpleader Relief in this matter against the Defendants WESTWOOD CAPITAL FUNDING LLC; HUNTINGTON BANCSHARES INCORPORATED; IRONWOOD FINANCE INC.; GULF COAST BANK AND TRUST COMPANY; AJ EQUITY GROUP LLC; RAISTONE PURCHASING LLC—SERIES XXI; GROVER CAPITAL LLC; RAYMOND PROPERTIES LLC; CAMPISI ENVIRONMENTAL ASSOCIATES, INC.; the COMMONWEALTH OF MASSACHUSETTS; and ARTHUR KURZYDLO. Weyerhaeuser brings this claim for Interpleader Relief pursuant to 28 U.S.C. §§ 1332, 1335, and Rule 22 of the Federal Rules of Civil Procedure.

I. PARTIES

1. Interpleader Plaintiff Weyerhaeuser Company is a corporation organized and incorporated under the laws of the State of Washington, with its principal place of business in Washington, and is a citizen of Washington.

2. Interpleader Plaintiff Weyerhaeuser NR Company is a corporation organized and incorporated under the laws of the State of Washington, with its principal place of business in Washington, and is a citizen of Washington.

3. Defendant Westwood Capital Funding LLC (“Westwood Capital”) is a limited liability company organized under the laws of New York and with its principal place of business in New York.

4. Defendant Huntington Bancshares Incorporated is a corporation organized and incorporated under the laws of Maryland and with its principal place of business in Maryland, and is a citizen of Maryland.

5. Upon information and belief, Defendant Ironwood Finance Inc. is a corporation organized and incorporated under the laws of Texas and with its principal place of business in Texas, and is a citizen of Texas.

1 6. Defendant Gulf Coast Bank and Trust Company is a corporation organized and
2 incorporated in the State of Louisiana with its principal place of business in Louisiana, and is a
3 citizen of Louisiana.

4 7. Defendant AJ Equity Group LLC is a limited liability company formed under the
5 laws of New York and with its principal place of business in New York. Upon information and
6 belief, AJ Equity Group LLC and its members are citizens of New York.

7 8. Defendant Raistone Purchasing LLC—Series XXI is a limited liability company
8 formed under the laws of Delaware and with its principal place of business in New York. Upon
9 information and belief, Raistone Purchasing and its members are citizens of Delaware and New
10 York.

11 9. Defendant Grover Capital LLC is a limited liability company formed under the laws
12 of New York and with its principal place of business in New York. Upon information and belief,
13 Grover Capital and its members are citizens of New York.

14 10. Defendant Raymond Properties LLC is a limited liability company organized under
15 the laws of Illinois and with its principal place of business in Illinois. Upon information and belief,
16 Raymond Properties and its members are citizens of Illinois.

17 11. Defendant Campisi Environmental Associates, Inc. is a corporation organized and
18 incorporated in the State of Massachusetts with its principal place of business in Massachusetts,
19 and is a citizen of Massachusetts.

20 12. Defendant Commonwealth of Massachusetts is a sovereign state of the United
21 States of America, with a principal place of business through its Attorney General in
22 Massachusetts.

23 13. Defendant Arthur Kurzydlo is an individual over the age of majority and who, upon
24 information and belief, is a resident of Chicago, Illinois and is a citizen of Illinois.

II. JURISDICTION AND VENUE

14. This is an Interpleader action brought pursuant to Rule 22 of the Federal Rules of Civil Procedure. This Court has original jurisdiction of this action pursuant to 28 U.S.C. § 1332 because the amount in controversy exceeds \$75,000 and there is complete diversity of citizenship between the parties because the plaintiff-stakeholder is diverse from the defendant-claimants. *See Gelfgren v. Republic Nat. Life Ins. Co.*, 680 F.2d 79, 81 (9th Cir. 1982) (“For interpleader under rule 22(1) predicated on diversity jurisdiction, there must be diversity between the stakeholder on one hand and the claimants on the other.”). The Court also has original jurisdiction of this action pursuant to 28 U.S.C. § 1335 because the amount in controversy exceeds \$500 and there is diversity of citizenship between two or more adverse defendant-claimants.

15. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b)(2) because a substantial part of the property that is the subject of this action is situated in this district.

III. FACTUAL BACKGROUND

16. Weyerhaeuser received services from Defendant Campisi Environmental Associates, Inc. (“Campisi”) and is currently holding \$296,071.46 (“**Funds**”) owed to Campisi in connection with those services. *See Exhibit A.*

17. On October 16, 2022, Defendant Campisi filed for relief under Chapter 7 of the U.S. Bankruptcy Code in Massachusetts. *See In re Campisi Environmental Associates Inc.*, Case No. 22-40749 (D. Mass. 2022). The Funds were scheduled by Campisi as property of its bankruptcy estate. On December 20, 2022, the Bankruptcy Court ordered that the Funds were abandoned as property of the bankruptcy estate. *Id.* at ECF No. 33.

18. Weyerhaeuser has learned of or received numerous claims to the Funds from Campisi’s creditors, who claim to have security interests in the Funds.

19. Defendant Huntington Bancshares Incorporated may have a perfected security interest in the Funds. Weyerhaeuser is aware of a UCC-1 financing statement filed by TCF Technology Finance, a Division of TCF National Bank (“TCF”). *See Exhibit B.* Upon information

1 and belief, Defendant Huntington acquired TCF and may have accordingly acquired TCF's interest
2 in the Funds.

3 20. According to its UCC financing statement, Defendant AJ Equity Group has a
4 perfected security interest in the Funds. *See Exhibit C.*

5 21. According to its UCC-1 financing statement, Defendant Raistone Purchasing has a
6 perfected security interest in the Funds. *See Exhibit D.*

7 22. According to its UCC-1 financing statement, Defendant Grover Capital has a
8 perfected security interest in the Funds. *See Exhibit E.*

9 23. According to its UCC-1 financing statement, Defendant Ironwood Finance has a
10 perfected security interest in the Funds. *See Exhibit F.*

11 24. According to its UCC-1 financing statement, Defendant Arthur Kurzydlo has a
12 perfected security interest in the Funds. *See Exhibit G.*

13 25. According to its UCC-1 financing statement, Defendant Gulf Coast Bank has a
14 perfected security interest in the Funds. *See Exhibit H.*

15 26. Defendant Commonwealth of Massachusetts has a tax lien (Lien No. 00000218578,
16 filed February 16, 2022) against the assets of Defendant Campisi and therefore may have a claimed
17 interest in the Funds.

18 27. Upon information and belief, Defendant Westwood Capital terminated its perfected
19 security interest in the Funds. Nevertheless, Defendant Westwood Capital has asserted a claim to
20 the Funds.

21 28. On March 18, 2022, Defendant Westwood Capital filed suit in Worcester County
22 Superior Court in Massachusetts against Campisi to collect on a judgment entered in Defendant
23 Westwood Capital's favor and against Campisi in the amount of \$250,067.00 by the Supreme
24 Court of the State of New York on or about November 5, 2021 (the "Massachusetts Action"). *See*
25 *Westwood Capital Funding LLC v. Campisi Environmental Associates, Inc.*, Case No.
26 2285CV00300 (Mass. Super. Ct. 2022).

1 29. Defendant Westwood Capital currently has a Motion to Turnover the Funds
2 pending before the Worcester County Superior Court scheduled for hearing on March 9, 2023. *See*
3 **Exhibit I.**

4 30. On or around February 7, 2023, Defendant Westwood Capital provided
5 Weyerhaeuser with a courtesy copy of the Motion and informed it of the upcoming court hearing.
6 Weyerhaeuser was not properly served with any pleadings in the Massachusetts Action, and in
7 fact, Defendant Westwood Capital informed Weyerhaeuser it did not need to appear at the hearing.

8 31. The Motion to Turnover seeks an order from the Worcester County Superior Court
9 compelling Weyerhaeuser to disburse and release the Funds to Defendant Westwood Capital.
10 However, Weyerhaeuser is not a party to the Massachusetts action, has not been properly served
11 or hailed into that court, and the Worcester County Superior Court has not determined whether it
12 has personal jurisdiction over Weyerhaeuser such that it may properly order Weyerhaeuser to turn
13 over the Funds. Moreover, none of the other potential claimants to the Funds are parties to the
14 Massachusetts action.

15 **IV. CAUSE OF ACTION IN INTERPLEADER**

16 32. Weyerhaeuser realleges and incorporates by reference the allegations in the
17 preceding paragraphs as if fully set forth herein.

18 33. Due to the conflicting claims to the Funds, Weyerhaeuser is unable to determine
19 the rightful beneficiaries, the rightful sums owed to said beneficiaries, or the priority order by
20 which the beneficiaries should be paid.

21 34. As a mere stakeholder, Weyerhaeuser claims no interest in the Funds other than
22 payment of its reasonable attorneys' fees and costs in connection with this action. Weyerhaeuser
23 is ready and willing to pay the Funds to the person or entities entitled to them, but is unable to
24 make a determination as to who is legally entitled to the Funds at issue, and in what amount,
25 without exposing itself to double or multiple liability from Defendants.
26

1 35. Weyerhaeuser therefore requests that this Court determine to which Defendants, in
2 what amounts, and in what order the Funds should be paid, and absolve Weyerhaeuser of all
3 liability for the Funds.

4 36. Weyerhaeuser is ready, willing, and hereby offers to immediately deposit the
5 Funds, \$296,071.46, into the Court Registry, for disbursement in accordance with the judgment of
6 this Court. Pursuant to Local Rule 67, Weyerhaeuser will move for a court order allowing it to
7 immediately deposit the Funds into the Registry.

8 37. Weyerhaeuser specifically reserves its right to seek attorneys' fees and costs for
9 bringing this interpleader action.

10 **V. PRAYER FOR RELIEF**

11 WHEREFORE, Interpleader Plaintiffs request the Court:

12 A. Grant leave to Plaintiffs to deposit the Funds, \$296,071.46, into the Court Registry;

13 B. Enjoin and restrain Defendants and any person or entity claiming through them,
14 and any other person making claim to the Funds, whether a party to this suit, during the pendency
15 of this proceeding and thereafter, from instituting or prosecuting any proceeding in any State or
16 United States court affecting the Funds;

17 C. Direct Defendants to interplead their rights to the Funds;

18 D. Dismiss Plaintiffs with prejudice from this action and discharge Plaintiffs from any
19 further liability;

20 E. Award Plaintiffs its reasonable attorneys' fees and costs incurred in connection with
21 this interpleader action; and

22 F. Award Plaintiffs such other and further relief as this Court deems just equitable and
23 proper.

1 DATED this 3rd day of March, 2023.

2 CAIRNCROSS & HEMPELMANN, P.S.

3
4 /s/ John R. Rizzardi

5 John R. Rizzardi, WSBA No. 9388
6 E-mail: jrizzardi@cairncross.com

7 /s/ Ana-Maria Popp

8 Ana-Maria Popp, WSBA No. 39614
9 E-mail: apopp@cairncross.com

10 /s/ Amy H. Yoon

11 Amy H. Yoon WSBA No. 58102
12 E-mail: ayoon@cairncross.com

13 524 Second Avenue, Suite 500
14 Seattle, WA 98104-2323
15 Telephone: (206) 587-0700
16 Facsimile: (206) 587-2308

17 Attorneys for Interpleader Plaintiffs
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Exhibit A

Vendor Line Item Display

Vendor
Company Code
3232653
0060

Name
City
CAMPISI ENVIRONMENTAL
WESTBOROUGH

St	DD	Reference	Ly	Amount in DC	Discount	Cur	DocumentNo	P	PB	DunnDate	B1	Dun	Dunn	Net due dt
<input type="checkbox"/>		6923	KN	14,021.29-	0.00	USD	1900221114							09/10/2021
<input type="checkbox"/>		6924	KN	14,042.35-	0.00	USD	1900220999							09/10/2021
<input type="checkbox"/>		6925	KN	24,332.84-	0.00	USD	1900221115							09/10/2021
<input type="checkbox"/>		6926	KN	9,357.50-	0.00	USD	1900221710							09/10/2021
<input type="checkbox"/>		7109	KN	7,178.75-	0.00	USD	1900221711							11/11/2021
<input type="checkbox"/>		7112	KN	13,863.98-	0.00	USD	1900221117							11/11/2021
<input type="checkbox"/>		7139	KN	21,638.45-	0.00	USD	1900221109							12/03/2021
<input type="checkbox"/>		7140	KN	35,483.69-	0.00	USD	1900221116							12/03/2021
<input type="checkbox"/>		7177	KN	12,235.35-	0.00	USD	1900234792							12/19/2021
<input type="checkbox"/>		7178	KN	31,694.50-	0.00	USD	1900234793							12/19/2021
<input type="checkbox"/>		7179	KN	4,436.25-	0.00	USD	1900234708							12/19/2021
<input type="checkbox"/>		7180	KN	43,630.46-	0.00	USD	1900234707							12/19/2021
<input type="checkbox"/>		7244	KN	6,210.00-	0.00	USD	1900249892							01/16/2022
<input type="checkbox"/>		7245	KN	8,529.27-	0.00	USD	1900249894							01/16/2022
<input type="checkbox"/>		7246	KN	38,814.06-	0.00	USD	1900248666							01/16/2022
<input type="checkbox"/>		7247	KN	5,592.50-	0.00	USD	1900249898							01/16/2022
<input type="checkbox"/>		7350	KN	641.32-	0.00	USD	1900039803							03/20/2022
<input type="checkbox"/>		7351	KN	1,470.00-	0.00	USD	1900039151							03/20/2022
<input type="checkbox"/>		7355	KN	1,342.50-	0.00	USD	1900039152							03/20/2022
<input type="checkbox"/>		7423	KN	1,556.40-	0.00	USD	1900111581							07/08/2022
*				296,071.46-	0.00	USD								

Exhibit B

UCC-1 Form

FILER INFORMATION

Full name: CORPORATION SERVICE COMPANY

Email Contact at Filer: FILINGDEPT@CSCINFO.COM

SEND ACKNOWLEDGEMENT TO

Contact name: CORPORATION SERVICE COMPANY

Mailing Address: 801 ADLAI STEVENSON DRIVE

City, State Zip Country: SPRINGFIELD, IL 62703 USA

DEBTOR INFORMATION

Org. Name: CAMPISI ENVIRONMENTAL ASSOCIATES, INC.

Mailing Address: 21 EAST MAIN STREET

City, State Zip Country: WESTBOROUGH, MA 01581 USA

SECURED PARTY INFORMATION

Org. Name: TCF TECHNOLOGY FINANCE, A DIVISON OF TCF NATIONAL BANK

Mailing Address: 11100 WAYZATA BOULEVARD, SUITE 801

City, State Zip Country: MINNETONKA, MN 55305 USA

TRANSACTION TYPE: STANDARD

ALTERNATIVE DESIGNATION:

CUSTOMER REFERENCE: 001-0799325-500 :TRX 423015 [198621072]

COLLATERAL

HPE DL380 GEN 10 INTEL SERVER, STORAGE, SOFTWARE AND RELATED EQUIPMENT AS LISTED ON BRIGHT VANGUARD LLC INVOICE ("PROPERTY") TOGETHER WITH ALL ACCESSORIES, ATTACHMENTS, PARTS, REPAIRS, UPGRADES, ADDITIONS, AND REPLACEMENTS ATTACHED THERETO OR INCORPORATED THEREIN; ALL SOFTWARE EMBEDDED IN OR ACQUIRED IN AN INTEGRATED TRANSACTION WITH THE PROPERTY, AND ALL MODIFICATIONS, ADDITIONS AND REPLACEMENTS THERETO AND ANY SUBSTITUTIONS THEREFOR; AND ALL PROCEEDS OF ANY OF THE FOREGOING, INCLUDING WITHOUT LIMITATION ALL INSURANCE PROCEEDS, RENTS, CASH, ACCOUNTS, INSTRUMENTS AND CHATTEL PAPER RELATED THERETO OR ARISING THEREFROM. THE COLLATERAL DESCRIBED IN THIS FINANCING STATEMENT IS WITHIN THE SCOPE OF ARTICLE 9 OF THE UNIFORM COMMERCIAL CODE AS ADOPTED IN THE STATE WHERE IT IS FILED.

Exhibit C

UCC FINANCING STATEMENT

FOLLOW INSTRUCTIONS

A. NAME & PHONE OF CONTACT AT FILER (optional)
B. E-MAIL CONTACT AT FILER (optional)
C. SEND ACKNOWLEDGMENT TO: (Name and Address)
<div style="border: 1px solid black; width: 100%; height: 100%; position: relative;"> <div style="position: absolute; top: 0; left: 0; width: 100%; height: 100%; border: 1px solid black;"></div> </div>

THE ABOVE SPACE IS FOR FILING OFFICE USE ONLY

1. DEBTOR'S NAME: Provide only one Debtor name (1a or 1b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); if any part of the Individual Debtor's name will not fit in line 1b, leave all of item 1 blank, check here ☐ and provide the Individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)

1a. ORGANIZATION'S NAME CAMPISI ENVIRONMENTAL ASSOCIATES, INC				
OR 1b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX	
1c. MAILING ADDRESS 21 East Main Street	CITY Westborough	STATE MA	POSTAL CODE 01581	COUNTRY USA

2. DEBTOR'S NAME: Provide only one Debtor name (2a or 2b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); if any part of the Individual Debtor's name will not fit in line 2b, leave all of item 2 blank, check here ☐ and provide the Individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)

2a. ORGANIZATION'S NAME				
OR 2b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX	
2c. MAILING ADDRESS	CITY	STATE	POSTAL CODE	COUNTRY

3. SECURED PARTY'S NAME (or NAME of ASSIGNEE of ASSIGNOR SECURED PARTY): Provide only one Secured Party name (3a or 3b)

3a. ORGANIZATION'S NAME AJ EQUITY GROUP LLC				
OR 3b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX	
3c. MAILING ADDRESS 1648 61 Street	CITY Brooklyn	STATE NY	POSTAL CODE 11204	COUNTRY USA

4. COLLATERAL: This financing statement covers the following collateral:

All accounts receivable, receipts, instruments, contract rights and other rights to receive the payment of money, patents, chattel paper, licenses, leases and general intangibles, whether now owned or hereafter acquired or arising, and all of Debtor's books and records relating to any of the foregoing.

5. Check <u>only</u> if applicable and check <u>only</u> one box: Collateral is <input type="checkbox"/> held in a Trust (see UCC1Ad, item 17 and Instructions) <input type="checkbox"/> being administered by a Decedent's Personal Representative	
6a. Check <u>only</u> if applicable and check <u>only</u> one box: <input type="checkbox"/> Public-Finance Transaction <input type="checkbox"/> Manufactured-Home Transaction <input type="checkbox"/> A Debtor is a Transmitting Utility	6b. Check <u>only</u> if applicable and check <u>only</u> one box: <input type="checkbox"/> Agricultural Lien <input type="checkbox"/> Non-UCC Filing
7. ALTERNATIVE DESIGNATION (if applicable): <input type="checkbox"/> Lessee/Lessor <input type="checkbox"/> Consignee/Consignor <input type="checkbox"/> Seller/Buyer <input type="checkbox"/> Bailee/Bailor <input type="checkbox"/> Licensee/Licensor	
8. OPTIONAL FILER REFERENCE DATA:	

UCC FINANCING STATEMENT

FOLLOW INSTRUCTIONS

A. NAME & PHONE OF CONTACT AT FILER (optional)
B. E-MAIL CONTACT AT FILER (optional)
C. SEND ACKNOWLEDGMENT TO: (Name and Address)
<div style="border: 1px solid black; height: 100px; width: 100%;"></div>

10

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OR				
2b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)		SUFFIX
2c. MAILING ADDRESS	CITY	STATE	POSTAL CODE	COUNTRY

3. SECURED PARTY'S NAME (or NAME of ASSIGNEE of ASSIGNOR SECURED PARTY): Provide only one Secured Party name (3a or 3b)

3a. ORGANIZATION'S NAME AJ EQUITY GROUP LLC				
OR				
3b. INDIVIDUAL'S SURNAME	FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)		SUFFIX
3c. MAILING ADDRESS 1648 61 Street	CITY Brooklyn	STATE NY	POSTAL CODE 11204	COUNTRY USA

4. COLLATERAL: This financing statement covers the following collateral:

All accounts receivable, receipts, instruments, contract rights and other rights to receive the payment of money, patents, chattel paper, licenses, leases and general intangibles, whether now owned or hereafter acquired or arising, and all of Debtor's books and records relating to any of the foregoing.

5. Check only if applicable and check only one box: Collateral is ☐ held in a Trust (see UCC1Ad, item 17 and Instructions) ☐ being administered by a Decedent's Personal Representative

6a. Check only if applicable and check only one box:

☐ Public-Finance Transaction ☐ Manufactured-Home Transaction ☐ A Debtor is a Transmitting Utility

6b. Check only if applicable and check only one box:

☐ Agricultural Lien ☐ Non-UCC Filing

7. ALTERNATIVE DESIGNATION (if applicable): ☐ Lessee/Lessor ☐ Consignee/Consignor ☐ Seller/Buyer ☐ Bailee/Bailor ☐ Licensee/Licensor

8. OPTIONAL FILER REFERENCE DATA:

UCC FINANCING STATEMENT

FOLLOW INSTRUCTIONS

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OR	1b. INDIVIDUAL'S SURNAME		FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX
1c. MAILING ADDRESS 21 East Main Street		CITY Westborough	STATE MA	POSTAL CODE 01581	COUNTRY USA

2. DEBTOR'S NAME: Provide only one Debtor name (2a or 2b) (use exact, full name; do not omit, modify, or abbreviate any part of the Debtor's name); if any part of the Individual Debtor's name will not fit in line 2b, leave all of item 2 blank, check here ☐ and provide the Individual Debtor information in item 10 of the Financing Statement Addendum (Form UCC1Ad)

2a. ORGANIZATION'S NAME					
OR	2b. INDIVIDUAL'S SURNAME		FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX
2c. MAILING ADDRESS		CITY	STATE	POSTAL CODE	COUNTRY

3. SECURED PARTY'S NAME (or NAME of ASSIGNEE of ASSIGNOR SECURED PARTY): Provide only one Secured Party name (3a or 3b)

3a. ORGANIZATION'S NAME AJ EQUITY GROUP LLC					
OR	3b. INDIVIDUAL'S SURNAME		FIRST PERSONAL NAME	ADDITIONAL NAME(S)/INITIAL(S)	SUFFIX
3c. MAILING ADDRESS 1648 61 Street		CITY Brooklyn	STATE NY	POSTAL CODE 11204	COUNTRY USA

4. COLLATERAL: This financing statement covers the following collateral:

All accounts receivable, receipts, instruments, contract rights and other rights to receive the payment of money, patents, chattel paper, licenses, leases and general intangibles, whether now owned or hereafter acquired or arising, and all of Debtor's books and records relating to any of the foregoing.

5. Check only if applicable and check only one box. Collateral is ☐ held in a Trust (see UCC1Ad, item 17 and Instructions) ☐ being administered by a Decedent's Personal Representative

6a. Check only if applicable and check only one box:

☐ Public-Finance Transaction ☐ Manufactured-Home Transaction ☐ A Debtor is a Transmitting Utility

6b. Check only if applicable and check only one box:

☐ Agricultural Lien ☐ Non-UCC Filing

7. ALTERNATIVE DESIGNATION (if applicable): ☐ Lessee/Lessor ☐ Consignee/Consignor ☐ Seller/Buyer ☐ Bailee/Bailor ☐ Licensee/Licensor

8. OPTIONAL FILER REFERENCE DATA:

Exhibit D

UCC-1 Form

FILER INFORMATION

Full name: **LIEN SOLUTIONS**

Email Contact at Filer: **UCCFILINGRETURN@WOLTERSKLUWER.COM**

SEND ACKNOWLEDGEMENT TO

Contact name: **JOHN JAMES**

Mailing Address: **2929 ALLEN PKWY STE 3300**

City, State Zip Country: **HOUSTON, TX 77019 USA**

DEBTOR INFORMATION

Org. Name: **CAMPISI ENVIRONMENTAL ASSOCIATES, INC.**

Mailing Address: **21 E MAIN ST SUITE 201**

City, State Zip Country: **WESTBOROUGH, MA 01581 USA**

SECURED PARTY INFORMATION

Org. Name: **RAISTONE PURCHASING LLC-SERIES XXI**

Mailing Address: **360 MADISON AVE, FLOOR 22**

City, State Zip Country: **NEW YORK, NY 10017 USA**

TRANSACTION TYPE: STANDARD

ALTERNATIVE DESIGNATION:

CUSTOMER REFERENCE: MA-0-86121210-63667671

COLLATERAL

ALL ACCOUNTS, GENERAL INTANGIBLES, AND ANY OTHER RIGHTS TO PAYMENT PURCHASED BY OR TRANSFERRED TO SECURED PARTY FROM DEBTOR UNDER A PURCHASE AGREEMENT DATED 04/13/2022 (AS MAY BE AMENDED, RESTATED, SUPPLEMENTED FROM TIME TO TIME) AND ALL THE PROCEEDS AND RIGHTS TO PAYMENT RELATED THERETO. THE TERMS "ACCOUNTS", "GENERAL INTANGIBLES" AND "PROCEEDS" SHALL HAVE THE MEANINGS GIVEN TO SUCH TERMS IN THE NEW YORK UNIFORM COMMERCIAL CODE AS IN EFFECT FROM TIME TO TIME.

Exhibit E

UCC-1 Form

FILER INFORMATION

Full name: **GROVER CAPITAL**

SEND ACKNOWLEDGEMENT TO

Contact name: **GROVER CAPITAL LLC**

Mailing Address: **2329 NOSTRAND AVE**

City, State Zip Country: **BROOKLYN, NY 11210 USA**

DEBTOR INFORMATION

Org. Name: **GREEN ENVIRONMENT INC.**

Mailing Address: **21 E MAIN ST SUITE 201**

City, State Zip Country: **WESTBOROUGH, MA 01581 USA**

Org. Name: **CAMPISI ENVIRONMENTAL ASSOCIATES, INC.**

Mailing Address: **21 E MAIN ST SUITE 201**

City, State Zip Country: **WESTBOROUGH, MA 01581 USA**

Org. Name: **CORPORATE ENVIRONMENTAL ADVISORS INC**

Mailing Address: **21 E MAIN ST SUITE 201**

City, State Zip Country: **WESTBOROUGH, MA 01581 USA**

SECURED PARTY INFORMATION

Org. Name: **GROVER CAPITAL LLC**

Mailing Address: **2329 NOSTRAND AVE**

City, State Zip Country: **BROOKLYN, NY 11210 USA**

TRANSACTION TYPE: STANDARD

ALTERNATIVE DESIGNATION: SELLER-BUYER

COLLATERAL

ALL ASSETS NOW OWNED OR HEREAFTER ACQUIRED AND WHEREVER LOCATED, INCLUDING BUT NOT LIMITED TO, THE FOLLOWING SUBCATEGORIES OF ASSETS: A. ACCOUNTS, INCLUDING BUT NOT LIMITED TO, CREDIT CARD RECEIVABLES; B. CHATTEL PAPER; C. INVENTORY; D. EQUIPMENT; E. INSTRUMENTS, INCLUDING BUT NOT LIMITED TO, PROMISSORY NOTES; F. INVESTMENT PROPERTY; G. DOCUMENTS; H. DEPOSIT ACCOUNTS; I. LETTER OF CREDITS RIGHTS; J. GENERAL INTANGIBLES; K. SUPPORTING OBLIGATIONS; AND L. PROCEEDS AND PRODUCTS OF THE FOREGOING. NOTICE PURSUANT TO AN AGREEMENT BETWEEN DEBTOR AND SECURED PARTY, DEBTOR HAS AGREED NOT TO FURTHER ENCUMBER THE COLLATERAL DESCRIBED HEREIN, THE FURTHER ENCUMBERING OF WHICH MAY CONSTITUTE THE TORTIOUS INTERFERENCE WITH THE SECURED PARTY'S RIGHT BY SUCH ENCUMBRANCER IN THE EVENT THAT ANY ENTITY IS GRANTED A SECURITY INTEREST IN DEBTOR'S ACCOUNTS, CHATTEL PAPER OR GENERAL INTANGIBLES CONTRARY TO THE ABOVE, THE SECURED PARTY ASSERTS A CLAIM TO ANY PROCEEDS THEREOF RECEIVED BY SUCH ENTITY

Exhibit F

UCC-1 Form

FILER INFORMATION

Full name: CORPORATION SERVICE COMPANY

Email Contact at Filer: FILINGDEPT@CSCINFO.COM

SEND ACKNOWLEDGEMENT TO

Contact name: CORPORATION SERVICE COMPANY

Mailing Address: 801 ADLAI STEVENSON DRIVE

City, State Zip Country: SPRINGFIELD, IL 62703 USA

DEBTOR INFORMATION

Org. Name: CAMPISI ENVIRONMENTAL ASSOCIATES INC

Mailing Address: 21 E MAIN ST STE 201

City, State Zip Country: WESTBOROUGH, MA 01581 USA

Last Name (i.e. Family Name or Surname): CAMPISI *First Name:* JOSEPH *Middle Name:* S

Mailing Address: 2410 TALBOT WAY

City, State Zip Country: WESTBOROUGH, MA 01581 USA

SECURED PARTY INFORMATION

Org. Name: IRONWOOD FINANCE, INC.

Mailing Address: 1127 2ND ST

City, State Zip Country: CORPUS CHRISTI, TX 78401 USA

**TRANSACTION TYPE: STANDARD
ALTERNATIVE DESIGNATION:**

CUSTOMER REFERENCE: [232714931]

COLLATERAL

ALL ACCOUNTS, ALL ACCOUNTS RECEIVABLE (PAST PRESENT AND FUTURE) CHATTEL PAPER, CASH, DEPOSIT ACCOUNTS, DOCUMENTS, EQUIPMENT, GENERAL INTANGIBLES, INSTRUMENTS, INVENTORY, OR INVESTMENT PROPERTY, AS THOSE TERMS ARE DEFINED IN ARTICLE 9 OF THE UNIFORM COMMERCIAL CODE (THE "UCC"), NOW OR HEREAFTER OWNED OR ACQUIRED BY DEBTOR: AND ALL PROCEEDS, AS THAT TERM IS DEFINED IN ARTICLE 9 OF THE UCC (THE "COLLATERAL") NOTIFICATION IS HEREBY GIVEN THAT DEBTOR AND GUARANTOR HAVE GRANTED A NEGATIVE PLEDGE TO IRONWOOD FINANCE INC WITH RESPECT TO THE COLLATERAL. ANY SUBSEQUENT LENDER OR LIENOR MAY BE TORTIOUSLY INTERFERING WITH IRONWOOD FINANCE'S RIGHTS.

Exhibit G

UCC-1 Form

FILER INFORMATION

Full name: **KURZYDLO ARTHUR**

Email Contact at Filer: **AKURZYDLO@AMERITECH.NET**

SEND ACKNOWLEDGEMENT TO

Contact name:

Mailing Address: **1170 SOUTH PLYMOUTH CT, APT 2NE**

City, State Zip Country: **CHICAGO, IL 60605 USA**

DEBTOR INFORMATION

Org. Name: **CAMPISI ENVIRONMENTAL ASSOCIATES, INC**

Mailing Address: **21 EAST MAIN STREET, SUITE 201**

City, State Zip Country: **WESTBOROUGH, MA 01581 USA**

SECURED PARTY INFORMATION

Last Name (i.e. Family Name or Surname): **KURZYDLO** *First Name:* **ARTHUR**

Mailing Address: **1170 SOUTH PLYMOUTH CT, APT 2NE**

City, State Zip Country: **CHICAGO, IL 60605 USA**

TRANSACTION TYPE: STANDARD

COLLATERAL

ALL ASSETS NOW OWNED OR HEREAFTER ACQUIRED AND WHEREVER LOCATED, INCLUDING BUT NOT LIMITED TO, THE FOLLOWING SUBCATEGORIES OF ASSETS: A. ACCOUNTS, INCLUDING BUT NOT LIMITED TO, CREDIT CARD RECEIVABLES; B. CHATTEL PAPER; C. INVENTORY; D. EQUIPMENT; E. INSTRUMENTS, INCLUDING BUT NOT LIMITED TO, PROMISSORY NOTES; F. INVESTMENT PROPERTY; G. DOCUMENTS; H. DEPOSIT ACCOUNTS; I. LETTER OF CREDITS RIGHTS; J. GENERAL INTANGIBLES; K. SUPPORTING OBLIGATIONS; AND L. PROCEEDS AND PRODUCTS OF THE FOREGOING. NOTICE PURSUANT TO AN AGREEMENT BETWEEN DEBTOR AND SECURED PARTY, DEBTOR HAS AGREED NOT TO FURTHER ENCUMBER THE COLLATERAL DESCRIBED HEREIN, THE FURTHER ENCUMBERING OF WHICH MAY CONSTITUTE THE TORTIOUS INTERFERENCE WITH THE SECURED PARTY'S RIGHT BY SUCH ENCUMBRANCER IN THE EVENT THAT ANY ENTITY IS GRANTED A SECURITY INTEREST IN DEBTOR'S ACCOUNTS, CHATTEL PAPER OR GENERAL INTANGIBLES CONTRARY TO THE ABOVE, THE SECURED PARTY ASSERTS A CLAIM TO ANY PROCEEDS THEREOF RECEIVED BY SUCH ENTITY

Exhibit H

UCC-1 Form

FILER INFORMATION

Full name:

Email Contact at Filer: SCRAFFERTY@AMERIFACTORS.COM

SEND ACKNOWLEDGEMENT TO

Contact name:

Mailing Address:

City, State Zip Country: ,

DEBTOR INFORMATION

Org. Name: **CAMPISI ENVIRONMENTAL ASSOCIATES, INC.**

Mailing Address: **21 E. MAIN ST. SUITE 201**

City, State Zip Country: **WESTBOROUGH, MA 01581 USA**

Org. Name: **CORPORATE ENVIRONMENTAL ADVISORS**

Mailing Address: **21 E. MAIN ST. SUITE 201**

City, State Zip Country: **WESTBOROUGH, MA 01581 USA**

Org. Name: **GREEN ENVIRONMENT**

Mailing Address: **21 E. MAIN ST. SUITE 201**

City, State Zip Country: **WESTBOROUGH, MA 01581 USA**

Org. Name: **RELY ENVIRONMENTAL**

Mailing Address: **21 E. MAIN ST. SUITE 201**

City, State Zip Country: **WESTBOROUGH, MA 01581 USA**

Org. Name: **STONEHILL ENVIRONMENTAL**

Mailing Address: **21 E. MAIN ST. SUITE 201**

City, State Zip Country: **WESTBOROUGH, MA 01581 USA**

Org. Name: **BOYLE ASSOCIATES**

Mailing Address: **21 E. MAIN ST. SUITE 201**

City, State Zip Country: **WESTBOROUGH, MA 01581 USA**

SECURED PARTY INFORMATION

Org. Name: **GULF COAST BANK AND TRUST COMPANY**

Mailing Address: **1170 CELEBRATION BLVD. SUITE 100**

City, State Zip Country: **CELEBRATION, FL 34747 USA**

TRANSACTION TYPE: STANDARD

Exhibit I

CELLAI LAW OFFICES, P.C.

ATTORNEYS AND COUNSELORS AT LAW

Cellai Law Offices, P.C.
268 Summer St, Suite LL
Boston, Massachusetts 02210

Cellai Law Offices, P.C.
150 Grossman Drive, Suite 201
Braintree, Massachusetts 02184

CARLO CELLAI, ESQ.*
RICHARD THOMAS DAVIES, ESQ.
BRIAN HOGENCAMP, ESQ.

*ALSO ADMITTED IN NEW YORK

PLEASE SEND ALL MAIL TO OUR BRAINTREE LOCATION

Phone: (617) 367-2199

Fax: (781) 356-0418

Website: www.cellailaw.com

Via: Certified Mail No. 9414 8118 9876 5834 4374 08

JOSEPH CAMPISI
14 MAGNOLIA LANE
NORTH GRAFTON, MA 01536

RE: Westwood Capital Funding LLC v. Campisi Environmental Associates, Inc. et al.

Docket No.: 2285CV00300

Dear Mr. Campisi,

Enclosed please find a Notice to Appear for Motion Hearing and Motion for Turnover. Kindly contact our office, or the Worcester Superior Court with any questions. Thank you for your attention to this matter.

Regards,

Cellai Law Offices, P.C.

By: 

Aleah Mofford, Legal Assistant

CELLAI LAW OFFICES, P.C.

ATTORNEYS AND COUNSELORS AT LAW

Cellai Law Offices, P.C.
268 Summer St, Suite LL
Boston, Massachusetts 02210

Cellai Law Offices, P.C.
150 Grossman Drive, Suite 201
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Fax: (781) 356-0418

Website: www.cellailaw.com

Via: Certified Mail No. 9414 8118 9876 5834 4364 87

CAMPISI ENVIRONMENTAL ASSOCIATES, INC.
21 E. MAIN ST, #201
WESTBOROUGH, MA 01581

RE: Westwood Capital Funding LLC v. Campisi Environmental Associates, Inc. et al.

Docket No.: 2285CV00300

Dear Sir or Madam,

Enclosed please find a Notice to Appear for Motion Hearing and Motion for Turnover. Kindly contact our office, or the Worcester Superior Court with any questions. Thank you for your attention to this matter.

Regards,

Cellai Law Offices, P.C.

By: 

Aleah Mofford, Legal Assistant

CELLAI LAW OFFICES, P.C.

ATTORNEYS AND COUNSELORS AT LAW

Cellai Law Offices, P.C.
268 Summer St, Suite LL
Boston, Massachusetts 02210

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Phone: (617) 367-2199

Fax: (781) 356-0418

Website: www.cellailaw.com

Via: Certified Mail No. 9414 8118 9876 5834 4360 50

Weyerhaeuser Company
220 OCCIDENTAL AVENUE SOUTH
SEATTLE, WA 98104

RE: Westwood Capital Funding LLC v. Campisi Environmental Associates, Inc. et al.

Docket No.: 2285CV00300


Dear Sir or Madam,

Enclosed please find a Notice to Appear for Motion Hearing and Motion for Turnover. Kindly contact our office, or the Worcester Superior Court with any questions. Thank you for your attention to this matter.

Regards,

Cellai Law Offices, P.C.

By: 
Aleah Mofford, Legal Assistant

NOTICE TO APPEAR FOR Motion Hearing	DOCKET NUMBER 2285CV00300	Trial Court of Massachusetts The Superior Court 
CASE NAME: Westwood Capital Funding Llc vs. Joseph S Campisi, Jr. et al		Dennis P. McManus, Clerk of Courts Worcester County
TO: Carlo Cellai, Esq. Cellai Law Offices, P.C. 150 Grossman Drive Suite 201 Braintree, MA 02184		COURT NAME & ADDRESS Worcester County Superior Court 225 Main Street Worcester, MA 01608
<p>The Court will hear the following event:</p> <p style="text-align: center;">Motion Hearing</p> <p>Counsel should appear as follows:</p> <p style="text-align: center;">Date: 03/09/2023 Time: 02:00 PM</p> <p>Session/ Courtroom Location: Civil A /</p> <p>FURTHER ORDER OF THE COURT: In person hearing re: Plaintiff's Motion for a Turnover of Funds</p>		
DATE ISSUED 01/18/2023	ASSOCIATE JUSTICE Hon. Janet Kenton-Walker	Dennis P. McManus, Clerk of Courts

Date Filed 11/8/2022 4:38 PM
 Superior Court - Worcester
 Docket Number 2285CV00300

E-FILED

COMMONWEALTH OF MASSACHUSETTS

WORCESTER, ss

SUPERIOR COURT DEPARTMENT
 DOCKET NO. 2285CV00300

WESTWOOD CAPITAL FUNDING, LLC
 Plaintiff

CAMPISI ENVIRONMENTAL ASSOCIATES,
 INC. AND JOSEPH CAMPISI A/K/A
 JOSEPH S. CAMPISI, JR.,
 Defendants

PLAINTIFF'S MOTION FOR AN ORDER OF NOTICE ON ITS MOTION FOR A
 TURNOVER OF FUNDS

Now comes the Plaintiffs and move that this Honorable Court issue an Order of Notice on the Plaintiff's Motion for a Turnover of Funds pursuant to Mass.R.Civ.P. 69 and M.G.L. c. 106 section 9-601. In support thereof, the Plaintiffs state through counsel that they purchased the future receivables of the Defendant, Campisi Environmental. The Plaintiffs took a security interest in all of the assets of the Defendant, Campisi Environmental and perfected it by filing a UCC-1 Financing Statement in the Commonwealth of Massachusetts, Secretary of State, Corporations Division. The Defendants, Campisi Environmental and Joseph Campisi defaulted on the transactions and Judgment entered against them in New York. Westwood filed this action based upon the New York Judgment in order to reduce it to a Massachusetts Judgment. Ultimately, Judgment also entered in this Court in favor of Westwood and against the Defendants, Campisi Environmental and Joseph Campisi based upon the New York Judgment. The Plaintiff now seeks an Order of Notice for a hearing on its Motion for a Turnover. The Motion for a Turnover would allow the Plaintiff, Westwood to obtain an ORDER which requires a particular debtor of the Defendant, Campisi Environmental to turn over funds that are subject to the secured interest of Westwood that was filed in the Massachusetts Secretary of State, Corporations Division, in order to satisfy the within Judgment.

WHEREFORE, the Plaintiff moves that this Honorable Court issue an ORDER that allows the Plaintiff to have its Motion for an Order of Turnover heard on an Order of Notice.

11/9/2022 Allowed. Hearing to take place in approximately 3-4 weeks, as scheduled by clerk.

11/7

Date Filed 11/8/2022 4:38 PM
Superior Court - Worcester
Docket Number 2285CV00300

The Plaintiff,
WESTWOOD CAPITAL FUNDING, LLC,

By their attorney,

/s/ Carlo Cellai

November 8, 2022

Carlo Cellai, Esq., BBO No. 558651

Cellai Law Offices, P.C.

150 Grossman Drive, Suite 201

Braintree, MA 02184

(617) 367-2199

carlo@cellailaw.com